

# *Law Offices of Gregory J. Vogt, PLLC*

2121 EISENHOWER AVENUE  
SUITE 200  
ALEXANDRIA, VA 22314

www.vogtlawfirm.com

Gregory J. Vogt  
703.838.0115 (office)  
703.684.3620 (fax)  
gvogt@vogtlawfirm.com

August 3, 2007

## **EX PARTE PRESENTATION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Petition for Forbearance and Waiver by Iowa Telecommunications  
Services, Inc.*, WC Docket No. 05-337

Dear Ms. Dortch:

This letter is to inform you that on August 2, 2007, the undersigned, on behalf of Iowa Telecommunications Services, Inc. ("Iowa Telecom"), met with Chris Moore, Legal Advisor to Commissioner Deborah Taylor Tate, in the above-referenced docket. The meeting addressed Iowa Telecom's petitions for forbearance from or waiver of the universal service high-cost loop mechanisms and the need for granting Iowa Telecom relief from the current universal service rules. Specifically, the parties discussed that the relief Iowa Telecom is seeking is in line with what other companies in rural Iowa are receiving and is about average among the support other mid-size carriers receive from the high cost loop program and provided the attached documents.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Respectfully submitted,

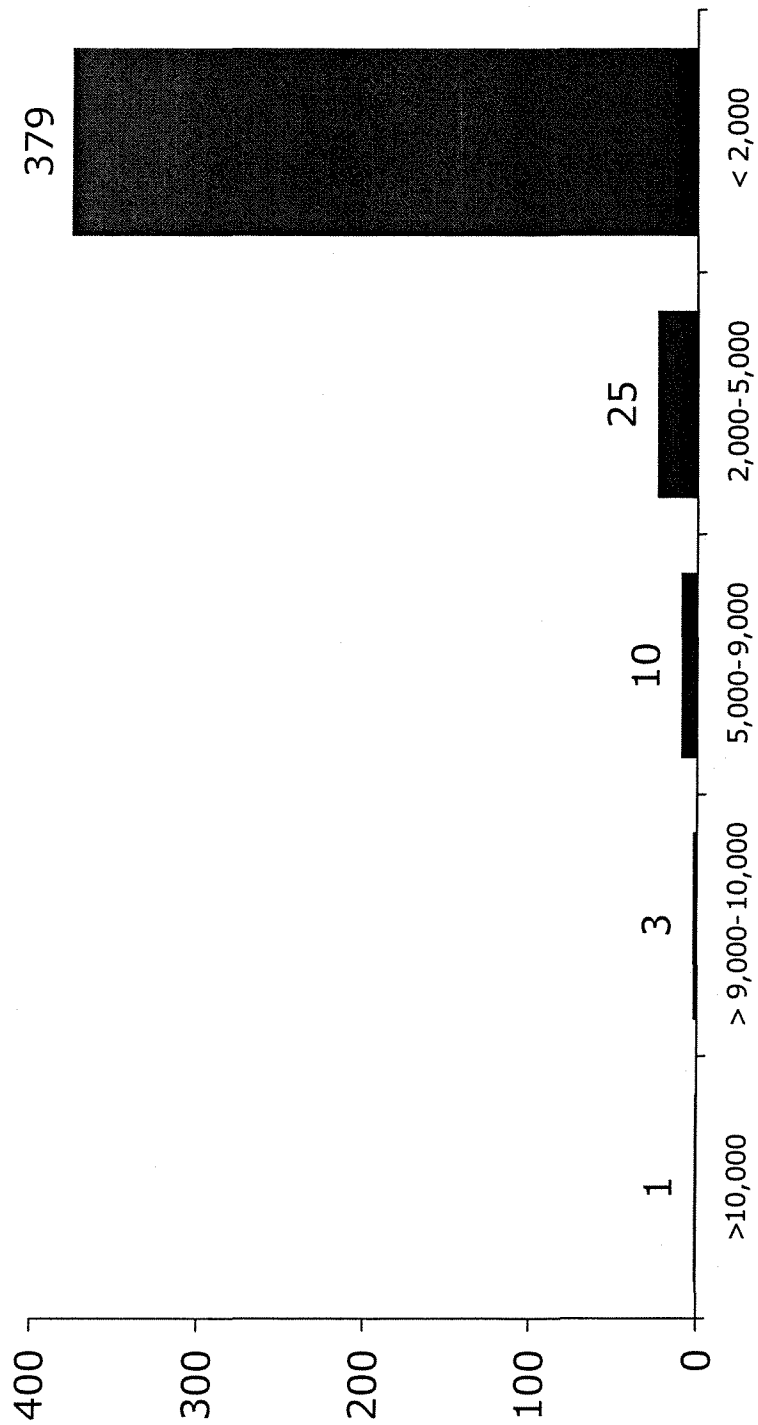
/s/ *Gregory J. Vogt*

Gregory J. Vogt

Enclosures

cc: Chris Moore

Iowa Telecom  
Population of Served Communities



## Selected Mid-Sized ILEC Comparisons

<b>Carrier</b>	<b>Approximate Loops*</b>	<b>Annual High-Cost Loop and Model-Based Support**</b>	<b>Sup/Loop/ Yr</b>	<b>Sup/Loop/ Month</b>
CenturyTel	2,207,026	\$155,320,011	\$76.19	\$6.35
Citizens	2,039,041	\$40,391,457	\$19.81	\$1.65
Consolidated	219,462	\$12,892,794	\$58.75	\$4.90
Embarq	4,116,757	\$23,890,698	\$5.80	\$0.48
Fairpoint	160,736	\$9,831,495	\$61.17	\$5.10
TDS	602,513	\$26,917,539	\$44.68	\$3.72
Windstream	2,917,613	\$13,871,646	\$6.93	\$0.58
Iowa Telecom	250,067	\$0	\$0.00	\$0.00

\* Not all operating companies could be matched, particularly for Fairpoint.

\*\* HCL based on most recent USAC annual data. HCM based on annualization from 3Q07 USAC projections. Access Replacement (such as IAS and ICLS) not included.

**Iowa ILEC USF High-Cost Loop and Model-Based Support Receipts**  
**(does not include access replacement, such as IAS and ICLS)**

Study Area Name	Working Loops	Annual High-Cost Loop and Model-Based Support	Sup/Loop/ Yr	Sup/Loop/ Month
ACE TEL ASSN-IA	4,712	\$0	\$0.00	\$0.00
ALPINE COMM.	6,117	\$478,665	\$78.25	\$6.52
ANDREW TEL CO INC	385	\$64,185	\$166.71	\$13.89
ARCADIA TEL CO	374	\$63,903	\$170.86	\$14.24
ATKINS TEL CO, INC	894	\$40,398	\$45.19	\$3.77
AYRSHIRE FARMERS MUT	335	\$153,288	\$457.58	\$38.13
BALDWIN-NASHVILLE	336	\$62,232	\$185.21	\$15.43
BARNES CITY COOP	176	\$43,239	\$245.68	\$20.47
BERNARD TEL CO INC	508	\$170,016	\$334.68	\$27.89
BREDA TEL CORP.	1,129	\$191,985	\$170.05	\$14.17
BROOKLYN MUTUAL TEL	1,532	\$35,838	\$23.39	\$1.95
BUTLER-BREMER MUTUAL	2,791	\$139,728	\$50.06	\$4.17
CASCADE COMM. CO.	1,847	\$81,606	\$44.18	\$3.68
CASEY MUTUAL TEL CO	451	\$63,762	\$141.38	\$11.78
CENTER JUNCTION TEL	149	\$38,121	\$255.85	\$21.32
CENTRAL SCOTT TEL CO	5,595	\$68,937	\$12.32	\$1.03
CENTURYTEL-CHESTER	198	\$54,399	\$274.74	\$22.90
CENTURYTEL-POSTVILLE	1,786	\$26,616	\$14.90	\$1.24
CITIZENS MUTUAL TEL	4,076	\$1,001,856	\$245.79	\$20.48
CLARENCE TEL CO	804	\$38,766	\$48.22	\$4.02
CLEAR LAKE INDEPEND	6,066	\$1,153,914	\$190.23	\$15.85
C-M-L TEL COOP ASSN	797	\$188,865	\$236.97	\$19.75
COLO TEL CO	724	\$256,380	\$354.12	\$29.51
COMM 1 NETWORK	668	\$40,764	\$61.02	\$5.09
COON CREEK TEL CO	648	\$43,782	\$67.56	\$5.63
COON VALLEY COOP TEL	621	\$120,162	\$193.50	\$16.12
COOP TEL EXCHANGE	628	\$121,533	\$193.52	\$16.13
COOPERATIVE TEL CO	1,551	\$256,803	\$165.57	\$13.80
CORN BELT TEL CO	790	\$38,466	\$48.69	\$4.06
CUMBERLAND TEL CO	368	\$63,711	\$173.13	\$14.43
DANVILLE MUTUAL TEL	963	\$41,286	\$42.87	\$3.57
DIXON TEL CO	589	\$51,813	\$87.97	\$7.33
DUMONT TEL CO	1,516	\$75,444	\$49.77	\$4.15
DUNKERTON TEL COOP	772	\$38,055	\$49.29	\$4.11
EAST BUCHANAN COOP	1,680	\$562,002	\$334.53	\$27.88
ELLSWORTH COOP ASSN	738	\$127,485	\$172.74	\$14.40
FARMERS & BUSINESSME	1,152	\$104,403	\$90.63	\$7.55
FARMERS & MERCHANTS	812	\$38,931	\$47.94	\$4.00
FARMERS (DEFIANCE)	278	\$57,582	\$207.13	\$17.26
FARMERS (MANILLA)	604	\$50,529	\$83.66	\$6.97
FARMERS COOP TEL CO	1,329	\$81,780	\$61.53	\$5.13
FARMERS MUTUAL COOP	1,829	\$390,126	\$213.30	\$17.78
FARMERS MUTUAL COOP	534	\$58,530	\$109.61	\$9.13
FARMERS MUTUAL COOP	2,503	\$185,526	\$74.12	\$6.18
FARMERS MUTUAL JESUP	1,976	\$17,382	\$8.80	\$0.73
FARMERS MUTUAL TEL	2,253	\$222,288	\$98.66	\$8.22
FARMERS MUTUAL TEL	1,146	\$192,342	\$167.84	\$13.99
FARMERS TEL CO - BAT	394	\$64,344	\$163.31	\$13.61
FARMERS TEL CO -RICE	1,613	\$257,928	\$159.91	\$13.33
FARMERS TEL CO-ESSEX	689	\$36,996	\$53.70	\$4.47
FENTON CO-OP TEL CO	332	\$61,989	\$186.71	\$15.56
GOLDFIELD TEL CO	559	\$53,919	\$96.46	\$8.04
GRAND MOUND COOP TEL	611	\$46,179	\$75.58	\$6.30

Study Area Name	Working Loops	Annual High-Cost Loop and Model-Based Support	Sup/Loop/ Yr	Sup/Loop/ Month
GRAND RIVER MUT-IA	8,234	\$0	\$0.00	\$0.00
GRISWOLD CO-OP TEL	1,976	\$246,474	\$124.73	\$10.39
HAWKEYE TEL CO	468	\$63,342	\$135.35	\$11.28
HEART OF IOWA COMM.	2,366	\$647,625	\$273.72	\$22.81
HEARTLND-HICKORYTECH	12,506	\$0	\$0.00	\$0.00
HILLS TEL CO, INC-IA	2,274	\$430,632	\$189.37	\$15.78
HOSPERS TEL EXCH INC	749	\$37,407	\$49.94	\$4.16
HUBBARD COOP ASSN	824	\$38,988	\$47.32	\$3.94
HUXLEY COMM. COOP.	1,758	\$80,334	\$45.70	\$3.81
IAMO TEL CO - IA	412	\$96,540	\$234.32	\$19.53
INTERSTATE 35 TEL CO	1,431	\$188,283	\$131.57	\$10.96
JEFFERSON TEL CO -IA	3,459	\$0	\$0.00	\$0.00
JORDAN SOLDIERVALLEY	341	\$78,795	\$231.07	\$19.26
KALONA COOP TEL CO	1,946	\$261,069	\$134.16	\$11.18
KEYSTONE FRMS COOP	992	\$185,598	\$187.09	\$15.59
KILLDUFF TEL. CO.	163	\$47,220	\$289.69	\$24.14
LA MOTTE TEL CO	742	\$37,320	\$50.30	\$4.19
LA PORTE CITY TEL CO	1,894	\$82,215	\$43.41	\$3.62
LAUREL TEL. CO., INC.	304	\$59,976	\$197.29	\$16.44
LEHIGH VALLEY COOP	1,886	\$251,994	\$133.61	\$11.13
LONE ROCK CO-OP TEL	275	\$57,273	\$208.27	\$17.36
LOST NATION-ELWOOD	639	\$180,696	\$282.78	\$23.56
LYNNVILLE TEL. CO.	362	\$63,492	\$175.39	\$14.62
MABEL COOP TEL-IA	996	\$185,976	\$186.72	\$15.56
MARNE & ELK HORN TEL	1,535	\$256,467	\$167.08	\$13.92
MARTELLE COOP ASSN	312	\$60,441	\$193.72	\$16.14
MASSENA TEL CO	661	\$123,642	\$187.05	\$15.59
MECHANICSVILLE TEL	836	\$39,336	\$47.05	\$3.92
MEDIAPOLIS TEL CO	2,417	\$116,373	\$48.15	\$4.01
MILES COOP TEL ASSN	727	\$36,939	\$50.81	\$4.23
MILLER TEL CO - IA	99	\$27,201	\$274.76	\$22.90
MINBURN TEL CO	414	\$64,440	\$155.65	\$12.97
MINBURN TELECOMM.	869	\$116,334	\$133.87	\$11.16
MINERVA VALLEY TEL	816	\$128,946	\$158.02	\$13.17
MODERN COOP TEL CO	947	\$210,810	\$222.61	\$18.55
MONTEZUMA MUTUAL TEL	2,210	\$84,183	\$38.09	\$3.17
MUTUAL TEL CO	630	\$46,263	\$73.43	\$6.12
MUTUAL TEL CO	5,305	\$0	\$0.00	\$0.00
NORTH ENGLISH COOP	894	\$40,365	\$45.15	\$3.76
NORTHEAST IOWA TEL	1,963	\$130,473	\$66.47	\$5.54
NORTHERN IOWA TEL CO	2,433	\$439,593	\$180.68	\$15.06
NORTHWEST IOWA TEL	5,557	\$72,051	\$12.97	\$1.08
NORTHWEST TEL COOP	1,325	\$247,659	\$186.91	\$15.58
OGDEN TEL CO - IA	1,862	\$23,517	\$12.63	\$1.05
OLIN TEL CO, INC	740	\$127,557	\$172.37	\$14.36
ONSLow COOP TEL ASSN	232	\$52,083	\$224.50	\$18.71
ORAN MUTUAL TEL CO	263	\$55,959	\$212.77	\$17.73
PALMER MUTUAL TEL CO	288	\$58,566	\$203.35	\$16.95
PALO COOP TEL ASSN	526	\$59,670	\$113.44	\$9.45
PANORA COMM COOP	1,978	\$17,265	\$8.73	\$0.73
PARTNER COMM. COOP.	1,250	\$254,076	\$203.26	\$16.94
PEOPLES TEL CO - IA	816	\$38,970	\$47.76	\$3.98
PRAIRIE TEL CO	1,057	\$189,126	\$178.93	\$14.91
PRAIRIEBURG TEL CO	216	\$49,797	\$230.54	\$19.21
PRESTON TEL CO	1,222	\$98,955	\$80.98	\$6.75
RADCLIFFE TEL CO	489	\$61,791	\$126.36	\$10.53
READLYN TEL CO	1,174	\$41,997	\$35.77	\$2.98

Study Area Name	Working Loops	Annual High-Cost Loop and Model-Based Support	Sup/Loop/ Yr	Sup/Loop/ Month
RINGSTED TEL CO	395	\$64,317	\$162.83	\$13.57
RIVER VALLEY TELECOM	932	\$126,708	\$135.95	\$11.33
ROCKWELL COOP ASSN	1,275	\$244,335	\$191.64	\$15.97
ROYAL TEL CO	454	\$63,705	\$140.32	\$11.69
RUTHVEN TEL EXCHANGE	772	\$38,034	\$49.27	\$4.11
SAC COUNTY MUTUAL	1,044	\$119,595	\$114.55	\$9.55
SCHALLER TEL CO	1,749	\$257,202	\$147.06	\$12.25
SCRANTON TEL CO	524	\$59,184	\$112.95	\$9.41
SEARSBORO TEL CO	362	\$63,492	\$175.39	\$14.62
SHARON TEL CO	1,151	\$107,880	\$93.73	\$7.81
SHELL ROCK TEL CO	1,021	\$165,615	\$162.21	\$13.52
SOUTH SLOPE COOP TEL	12,874	\$0	\$0.00	\$0.00
SOUTHWEST TEL EXCH	766	\$165,306	\$215.80	\$17.98
SPRINGVILLE COOP TEL	1,213	\$41,682	\$34.36	\$2.86
STRATFORD MUTUAL TEL	539	\$21,279	\$39.48	\$3.29
SULLY TEL ASSOC	2,896	\$76,899	\$26.55	\$2.21
SUPERIOR TEL COOP	319	\$48,711	\$152.70	\$12.72
SWISHER TEL CO	985	\$41,496	\$42.13	\$3.51
TEMPLETON TEL CO	389	\$64,257	\$165.19	\$13.77
TERRIL TEL. COOP.	471	\$62,718	\$133.16	\$11.10
THE BURT TEL CO	426	\$64,392	\$151.15	\$12.60
TITONKA TEL CO	545	\$57,300	\$105.14	\$8.76
UNITED FARMERS TEL	547	\$0	\$0.00	\$0.00
VAN BUREN TEL CO	2,863	\$376,116	\$131.37	\$10.95
VAN HORNE COOP TEL	592	\$52,398	\$88.51	\$7.38
VENTURA TEL CO, INC	466	\$54,624	\$117.22	\$9.77
VILLISCA FARMERS TEL	1,140	\$107,343	\$94.16	\$7.85
WALNUT TEL CO, INC	757	\$37,698	\$49.80	\$4.15
WEBB-DICKENS TEL	404	\$0	\$0.00	\$0.00
WEBSTER-CALHOUN COOP	4,836	\$957,801	\$198.06	\$16.50
WELLMAN COOP TEL	1,328	\$40,587	\$30.56	\$2.55
WEST IOWA TEL CO	5,065	\$237,411	\$46.87	\$3.91
WEST LIBERTY TEL CO	3,955	\$34,530	\$8.73	\$0.73
WESTERN IOWA ASSN	3,811	\$504,294	\$132.33	\$11.03
WESTSIDE INDEPENDENT	363	\$63,282	\$174.33	\$14.53
WILTON TEL CO	1,893	\$21,297	\$11.25	\$0.94
WINNEBAGO COOP ASSN	6,620	\$1,031,055	\$155.75	\$12.98
WOOLSTOCK MUTUAL	232	\$52,083	\$224.50	\$18.71
WYOMING MUTUAL TEL	633	\$45,492	\$71.87	\$5.99
FRONTIER IOWA	52,297	\$0	\$0.00	\$0.00
ITS -- IOWA TELECOM	75,831	\$0	\$0.00	\$0.00
ITS -- IOWA TELECOM NORTH	106,732	\$0	\$0.00	\$0.00
ITS -- IOWA TELECOM SYSTEMS	67,504	\$0	\$0.00	\$0.00
QWEST CORP-IA	933,367	\$0	\$0.00	\$0.00
Total -- Excluding Qwest, ITS, and Frontier	227,595	\$20,180,991	\$88.67	\$7.39
Total -- Including Qwest, ITS, and Frontier	1,463,326	\$20,180,991	\$13.79	\$1.15

Of the small carrier lines, more than 74% get at least \$1/loop/month and more than half get at least \$4.17/loop/month.

Source: USAC 3Q07 FCC Filing, Appendix HC01